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March 19th, 2018

Via ECF

Honorable Lorna G. Schofield.
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Flores, Carrasco, et al. v. NYC Pasta and Risotto Co. LLC, et al.;
17-cv-6915 (LGS)

Dear Judge Schofield:

I represent Plaintiffs in the above referenced matter and submit this letter on behalf of both parties to apprise the Court of the status of this action.

Defendants have stated to their counsel that they will be filing for bankruptcy protection but they have not yet done so. As a result, Defendants have not produced pay records nor time records for the Plaintiffs herein, nor have depositions been conducted. Counsel have scheduled a deposition of one defendant to take place on April 2, 2018.

The parties jointly ask for an extension of the existing discovery deadline from April 17th, 2017 until May 18th, 2018 so that the parties can schedule depositions and/or the Defendants can file for bankruptcy if they so intend.

The parties jointly apologize to the Court for the late submission of this letter.

Respectfully Submitted,

/s/ Colin Mulholland, Esq.

Colin Mulholland, Esq.

To Defendants:
By ECF